

HUD-L-001578-20 04/15/2020 Pg 2 of 7 Trans ID: LCV2020750667

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SUPERIOR CIVIL PART

APR 17 2020

SUPERIOR COURT OF NEW JERSEY
COUNTY OF HUDSON

Form A

Received, but Not Filed

APR 01 2020

Hudson Fee Office

Plaintiff or Filing Attorney Information:

Name Talaat M Mohamed

NJ Attorney ID Number _____

Address 104-CORBIN AV # 1AJersey City NJ - 07306Telephone Number 551-998-0954

RECEIVED #17

APR 01 2020

SUPERIOR COURT OF N.J.
FEE OFFICE
COUNTY OF HUDSONTalaat M Mohamed

Plaintiff,

v.

Lawyer: Ricky E Bagolie - 648 Newark AvJersey City - NJ - 07306 T. 201-656-8500

Defendant(s).

2 Njm Insurance - West Trenton, NJ - 08628301 Sullivan Way T. 609-883-1300Plaintiff, Talaat M Mohamed, residing at

(your name)

104-CORBIN AV # 1A Jersey City - NJ - 07306, City of

(your address)

(your city or town)

County of HUDSON

(your county)

Superior Court of New Jersey

Division HUDSON County

Part

Docket No: _____

(to be filled in by the court)

Civil Action

Complaint

State Of New Jersey, complaining of defendant, states as follows:

1. On 04-10, 2019, Ricky E & Njm Insurance, Defendant

(name of person being sued)

(Summarize what happened that resulted in your claim against the defendant. Use additional pages if necessary.)

Please read my complaint with the request.The defendant in this action resides at 1-Ricky E Bagolie Attorney - 648 Newark Av
Jersey City - NJ - 07306 - & 2 Njm Insurance Group

(defendant's address)

In the County of West Trenton - NJ - 08628, State of New Jersey.


(name of county where defendant lives)

T- 609-883-1300

2. Plaintiff is entitled to relief from defendant under the above facts

BATCH #	342
RECEIVED DATE	4/15/20
CA / CK / MD / CG	
CK/CG ACCT. #	6302
AMOUNT	\$250-
PAYOR	Mohamed

HUD-L-001578-20 04/15/2020 Pg 1 of 7 Trans ID: LCV2020750667

Civil Case Information Statement (CIS)		For Use by Clerk's Office Only	
 <p>Use for initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed</p>		Payment type: <input type="checkbox"/> ck <input type="checkbox"/> cg <input type="checkbox"/> ca	
		Chg/Ck Number:	
		Amount:	
		Overpayment:	
		Batch Number:	
Attorney/Pro Se Name TALAAT MOHAMED		Telephone Number 551-998-0954	
Firm Name (if applicable)		County of Venue HUDSON	
Office Address 104 CORBIN AVE #1A JERSEY CITY NJ - 07306		Docket Number (when available)	
Name of Party (e.g., John Doe, Plaintiff) Ricky-Bagolie & NJM Insurance Group		Document Type	
Caption TALAAT-M-MOHAMED VS Ricky-Bagolie & NJM Insurance Group		Jury Demand <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Case Type Number (See reverse side for listing) (505)	Are sexual abuse claims alleged? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Is this a professional malpractice case? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If you have checked "Yes," see N.J.S.A. 2A:53A-27 and applicable case law regarding your obligation to file an affidavit of merit.	
Related Cases Pending? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If "Yes," list docket numbers	
Do you anticipate adding any parties (arising out of same transaction or occurrence)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Name of defendant's primary insurance company (if known) LAWER-MR. Ricky-Bagolie & NJM Insurance Group <input type="checkbox"/> None <input type="checkbox"/> Unknown	
The Information Provided on This Form Cannot be Introduced into Evidence.			
Case Characteristics for Purposes of Determining if Case is Appropriate for Mediation			
Do parties have a current, past or recurrent relationship? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		If "Yes," is that relationship: <input type="checkbox"/> Employer/Employee <input type="checkbox"/> Friend/Neighbor <input type="checkbox"/> Other (explain) <input type="checkbox"/> Familial <input checked="" type="checkbox"/> Business NJM Insurance Group	
Does the statute governing this case provide for payment of fees by the losing party?		<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition Ricky-Bagolie-Lawer & NJM Insurance Group			
Do you or your client need any disability accommodations? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		If yes, please identify the requested accommodation.	
Will an interpreter be needed? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		If yes, for what language? ARABIC	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
Attorney Signature: Talaat-M-Mohamed			

Form A

3. The harm that occurred as a result of defendant's acts include: (list each item of damage and injury)

1. _____

2. _____

3. _____

Wherefore, plaintiff requests judgment against defendant for damages, together with attorney's fees, if applicable, costs of suit, and any other relief as the court may deem proper.

Dated: _____ Signature: _____

CERTIFICATION OF NO OTHER ACTIONS

I certify that the dispute about which I am suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: 03-28-2020 Signature: Talaat-Mohamed

OPTIONAL: If you would like to have a judge decide your case, do not include the following paragraph in your complaint. If you would prefer to have a jury to decide your case, please sign your name after the following paragraph.

JURY DEMAND

The plaintiff demands trial by a jury on all of the triable issues of this complaint, pursuant to New Jersey Court Rules 1:8-2(b) and 4:35-1(a).

Dated: 03-28-2020 Signature: Talaat-Mohamed

Talaat Mohamed

104 Corbin Avenue – Apt 1A

Jersey City, NJ 07306

Tel: 551-998-0954

Complaint

In the Name of ALLAH, Most Gracious, Most Merciful

{If You Rule among people, Judge by Justice}

To Whom It May Concern:

Gentlemen:

Answer Form A

My damages together from attorney, Ricky Bagolie and NJM Insurance Group are hereby requested as follows:

1. I am entering this demand in the amount of three million dollars (\$3,000,000.00) in one payment due to the extent of my injuries. I now have psychological conditions that did not exist prior to this accident. Additionally, I am suffering from neurological conditions that affected me as well. NJM Insurance Group intentionally delayed my treatment as well as attorney Ricky Bagolie which was ordered by the Court.
2. I also lost my experience in my trade, as my profession is Electrician for diesel truck; heavy equipment, and hydraulic system. My total work history in this field exceeds forty (40) years.
3. I also wish to have a review of all settlements in relation to my accident which occurred June 10, 2010. The Order for Total Disability and the disbursements are not clear to me,
4. I should be awarded increase in payment amounts as I would have been given salary increases had I still been gainfully employed. Further, I would have gained additional experience in my field of work which would have increased my potential for consideration by other companies, thereby making me more marketable.
5. I have had six (6) surgeries: four (4) on my right leg; one (1) on my spine; and one (1) on my neck. According to the Doctor, I still need another operation on my left heel/ankle.
6. Finally, I suffer with a condition that causes uncontrollable shaking in both legs/knees and frequently experience dizziness. I'm overcome by fear at the sound of any truck, especially those with very loud noises as I'm frozen with panic that I will be hit again.

Thanks to you all and May GOD reward you with all the good in support of the truth.

Respectfully,

Talaat Mohamed



03-30-2020

Talaat Mohamed
104 Corbin Ave.#1A
Jersey City,NJ.07306
Tel.: 551-998-095

02/27/2020

Complaint

In The name Of Allah, Most Gracious, Most Merciful
(If You Rule among people, Judge bu justice)

To Whom It May Concern:

Gentlemen,

Please be advised that I am writing this complaint against Mr. Ricky Bagolie, An attorney doing business at 648 Newark Ave., Jersey City, NJ.07306 who represented Me in a work related accident that tookplace in 2010 while working at Kearny Steel Containers Corp. located in Newark, NJ.

- 1- I am oppressed because my lawyer, Mr. Ricky Bagolie promised me in court that I will receive \$25000.00 from NJM. The employer's insurance company. However, I only received \$15000.00 leaving me a balance due to me of Ten Thousand Dollars.
- 2- The period from April, 2018 to May, 2019 I did not receive any payment for this period. My lawyer promised to get me this amount but he did not keep his promise.
- 3- I asked him about my annual pay increase from the date of the accident, and told me that I am noe entitled to any increase by law. He was so angry when- I asked him to do so. Then I went to Washington D.C. and met with my Congressman who confirmed to me that I am entitled to such increase. It is The Law and I have the proof.
- 4- In 2018 my lawyer sent me to doctor for examination and he decided that I need operation on the left leg heel as well as physical therapy to helpme with other bone injuries resulting from the accident. My lawyer didn.t care ask the when I can o for the operation and told me we need to go to the court first to collect the money and then we take care of the operation. I didn't the money or operated on. This is not honest work or handling my business with sincerity. I do not know why he did not ask the court to order the operation to finish my treatment and suffering and ask for the money in the same session?.
- 5- My lawyer also promised to send me to Dr. "Gardano" after receiving the first Check but he waited seven month before doing so. He also refused to send me to a neutral orthopedic doctor instead he sent me a letter I am enclosing it herein with the complaint.
- 6- I am asking for immediate investigation into all the matters referred to above. I am looking forward to get all my rights from the beginning of the accident untill now. I want a jury and I want all my rights at once.
- 7- From my point of view my lawyer collected his fees and that was all his concern and left me without teatment and monetary compensation. I am in bad shape physically and psychologically. Please I am desperate for your help.
- 8- I am also asking to probate all payments cotained in the attached copies of "ORDER FOR TOTAL DISABILITY" forms

Thanks to you all. May God reward you with all the good to support the truth.

Respectfully,



Talaat M. Mohamed